

FCC MAIL ROOM

SEP 22 1998

October 15, 1998

Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
1919 M st.
N. W., Room 222
Washington, DC, 20554

Dear Federal Communications Commission,
Here follow my detailed comments to your recent NPRM
WT Docket No 98-143 (Amendment of Part 97 of the Commission's
Amateur Service Rules).

Executive Summary

I strongly support the recent ARRL Proposal submitted to you on July 22, 1998 which calls for License Restructuring of the Amateur Radio Service. I believe the ARRL has taken a very brave and very correct action in supporting a change in the current high frequency (HF) shortwave regulations. The present Morse code requirements are out of line with the rest of the world and do not serve the best interests of the amateur community.

Although Morse code will (and should) continue to be used on the international short wave bands, the present requirement for a general class operator to pass a 13 WPM code test has led to a serious decline in new operators using these bands. Furthermore, I believe that it simply does not make any sense for an individual to spend many months (or years) working to acquire this very high code speed, only so he or she can then have voice privileges on the HF bands.

The FCC license exams should be based on what is actually required of an operator and not as a "filter" to keep out "undesirables". I believe that a code speed of 5 or 7 WPM is perfectly adequate for an HF operator and if we really must have this "filtering", we should increase the difficulty of the written test to compensate for the lower Morse code requirement.

In contrast to the ARRL proposal, I strongly disagree with the FCC NPRM proposal as it now stands. My number one objection is that elimination of the present Novice and Tech plus license classes with their 5 WPM code test will leave us NOTHING as an intermediate step between the no code license and the General license with its 13 WPM requirement. Experience

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has shown that new Hams need to get on the air to help them increase their code speed enough to pass a 13 WPM test. The FCC proposal would, in effect, virtually eliminate any new upgrades to General class license and seriously impact the future of amateur radio. Finally, it will be a great injustice to reclassify (i.e.: down grade) to Code Free Technician those of us who have worked hard to pass our 5 WPM test.

Here Are My Specific Comments on the FCC NPRM Proposal by Article

Article #12 There is a serious problem with this article as it is now written. If we get rid of the Novice (and Tech Plus) license but still retain the 13 WPM requirement for the general license, how will new operators be able to increase their code speed without access to the CW bands? As every operator knows, we need the help of others through CW contacts to build-up our code speed. If you eliminate the Novice license without lowering the CW requirements, there will be virtually no further upgrades to General class and use of the HF bands will continue to decline as the present General class population ages and dies off. On the Novice band "refarming" issue, I believe that the ARRL proposal is best. If we allow Novice operators to use the entire General class CW band, then we can reallocate the present Novice frequencies for Phone use.

Article #13

My response to this is similar to article #12. In addition, this proposed action is even more flawed in that it effectively down grades those of us who have passed the 5 WPM code test. I worked hard to pass my 5 WPM code test (CW practice every day for three months) and I will feel INSULTED and HUMILIATED to be reclassified as a no code Technician. This is simply not fair!

Furthermore, I strongly disagree with your statement that most Technicians use only FM voice and packet. I have used only CW for the last 3 years in my attempt to learn 13 WPM! The least you could do is encourage those of us who have passed 5 WPM to upgrade to General by reducing the present 13 WPM requirement to something less than 10 WPM (i.e: choose a code speed that a normal working person can pass in his or her lifetime).

Article #14

Yes, I agree with your proposal.

Article #17

I agree with the ARRL proposal. We really need the help of licensed amateurs to help enforce the communications laws, particularly on the 80 and 40 meter short wave bands. Too many stations are on the air without call signs, using obscenities, broadcasting, etc. Having all these people on the air without any license at all makes a total mockery of your present 13 WPM requirement. If you would just fix the present unfair communications laws, I am sure that many amateurs will be glad to help the FCC "clean-up" these bands.

Article #20

I agree that the present requirements for Morse code proficiency should be reduced and that a more rigorous electronics exam take its place. The United States would certainly benefit from more Ham operators having an improved electronics knowledge. But how does the present requirement of code proficiency benefit anyone except those who want the HF Ham bands all to themselves? Please change these regulations!

Article #24

I think it is most important that we establish a "reasonable" testing level which will permit the average working American to attain a General class license in a "reasonable" amount of time. Of course, "reasonable" is a relative term. However, I believe that a few months of total studying time (code and theory) should be enough to satisfy the US government. I believe that the ARRL Proposal of 5WPM for the General license and something higher, such as 10 or 12 WPM for the next higher class license is appropriate.

In my own case, the theory test for Technician Plus required only two weeks of light studying but the 5 WPM code test required me to practice 30 minutes/day, each day for three months. Many Hams I know needed several years work to pass their 13 WPM test. And what is the purpose of all this work? Once passed, 90 percent of the Ham community quickly forgets the code and reverts to using single side band or AM transmission. So, the present 13 WPM code requirement is entirely unrealistic and NOT in the best interests of the US government or the Ham community.

I would further argue that for years, the FCC First Class Radio Telephone License only required passing a difficult theory exam. So, no code was required to operate even a 50KW commercial station. Yet, under our present amateur regulations, we cannot operate even a 5 Watt VOICE transmitter on the HF shortwave bands without passing a very difficult CW exam.

Article#25

I agree with the ARRL proposal. I believe that the current practice of giving "disability credit" for handicapped operators has become a sham. Individuals should be required to prove their handicap, other than just having a doctor's certificate. Does anyone ever check to see if these doctors are real or that they truly understand what privileges they are providing? With such a large number of exemptions being given, I seriously doubt if the majority of the applicants are truly disabled. And these people should also be required to pass a more difficult theory exam to make up for not learning the code.

Article#27

The present written exam questions seem fair and well thought out. The only objection I have with our present licensing system is the Morse code testing which I feel is completely out of all proportion to our present operating practices. We should reduce the Morse code requirement to 5 or 7WPM for the General license.

Thank you for listening to my views.
Sincerely,

A handwritten signature in black ink, appearing to read "Charles Kitchin", with a long horizontal flourish extending to the right.

Charles Kitchin
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